

Exhibit 43

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF NEW JERSEY

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5 IN RE: VALSARTAN, LOSARTAN, MDL No. 2875
6 AND IRBESARTAN PRODUCTS
7 LIABILITY LITIGATION HON ROBERT B.
8 KUGLER

9 *****

10 THIS DOCUMENT APPLIES TO ALL
11 CASES

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15 - CONFIDENTIAL INFORMATION -
16 SUBJECT TO PROTECTIVE ORDER

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18 Continued Remote Videotaped via
19 Zoom Deposition of HAI WANG, commencing at
20 9:07 a.m., on the 11th of March, 2021, before
21 Maureen O'Connor Pollard, Registered
22 Diplomate Reporter, Realtime Systems
23 Administrator, Certified Shorthand Reporter.
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28 GOLKOW LITIGATION SERVICES
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1 offered the same price as CVS. Like you have
2 predicted during your recent visit of Huahai
3 US, we may have to lower our Valsartan price
4 to keep our current market share. We don't
5 want valsartan to be 2nd Losartan case. We
6 have to be proactive."

7 That's what you wrote that day,
8 right?

9 A. That's correct.

10 Q. And Mr. Chen is who? What's
11 his role in ZHP?

12 A. He's the chairman of ZHP.

13 Q. He's the highest level
14 executive in the whole company, right?

15 A. Yes.

16 MR. GOLDBERG: Objection.

17 BY MR. SLATER:

18 Q. And this is reciting that
19 Mr. Chen actually visited Huahai US for
20 business, correct?

21 A. Yeah, Mr. Chen is the chairman,
22 so he visited subsidiary from time to time.

23 Q. Is that something he does on a
24 routine basis?

1 A. Yes, before the pandemic.

2 Q. Before the pandemic, how often
3 would Mr. Chen visit the United States
4 businesses?

5 A. Once a year, twice a year.

6 Q. When you refer to the fact that
7 he had predicted during his recent visit that
8 you may have to lower the valsartan price to
9 keep your current market share, do you
10 remember the context of that discussion?

11 MR. GOLDBERG: Objection to
12 form.

13 A. Because when I see in the US
14 market, Mr. Chen's overseen all the API
15 operations, he has more intell in terms of
16 API competition, because it's eventually
17 going to trickle down to the finished dosage
18 form market. If they see very competitive
19 API offering, that was the discussion, so we
20 needed to be proactive.

21 BY MR. SLATER:

22 Q. And his conclusion had been,
23 and -- rephrase.

24 It appears that --